



State of California  
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**Inquiry:** Is it within your scope of practice for licensed RCPs to perform and record the CLIA moderately complex Activated Clotting Time (ACT) point-of-care testing in the hospital setting? All point-of-care testing performed by non-laboratory personnel at the Hospital is performed under the overall operations and administration of the laboratory director who determines the qualification and competency of the personnel. The State of California Laboratory Field Services, in the past, determined that RCPs could not do any test besides blood gases, however, upon my recent inquiry, they are currently deferring to the scope of practice for RCPs. I have reviewed sections 3700-3706 of the B&P Code, but need your interpretation regarding the performance of this specific test by RCPs.

**Response:** The performance of laboratory testing, using an instrument that is classified under Clinical Laboratory Improvement Administration (CLIA) as moderately complex by licensed RCPs, is authorized under Business & Professions Code Sections 1206.5(a)(9) and 1206.5(b)(8).

Reference # 2000-C-14